

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

EDWARD AVILES CRUZADO

Debtor(s)

Case No. 13-07924 ESL

Chapter 13

OPPOSITION TO DISMISSAL

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. The trustee filed a motion requesting dismissal because debtor has not file the necessary documents required in the case.
2. Debtor's petition was prepared by a third party that only filed the petition and abandoned him to his fate without further support. We assumed the legal representation of debtor and requested 10 days to complete the missing documents or forms.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above and deny motion to dismiss.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this same date a true and exact copy of the foregoing has been filed with the Clerk of the Court that will be notified to the Chapter 13 Trustee José R. Carrión Morales and all other appearing parties using the Court's CM/ECF system. Non appearing parties will be notified by U. S. regular mail as per Master Address List attached.

In Vega Baja, Puerto Rico, on this December 5, 2013

s/ Juan O. Calderon Lithgow
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
APARTADO 1710
VEGA BAJA, PR 00694-1710
TEL.: 787-858-5476
Email: caldlithlaw@gmail.com